## UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

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In re:	8 §	Chapter 11
FIELDWOOD ENERGY III, LLC, et al.,	§ 8	Case No. 20-33948 (MI)
,,,,,,,,,,,,,	\$ \$	(4.11)
Post-Effective Date Debtors. <sup>1</sup>	8 §	Re: Docket Nos. 1395, 1456, 1509, 1515
	§ §	

## NOTICE OF WITHDRAWAL OF MARUBENI OIL & GAS (USA) LLC'S OBJECTION TO DEBTORS' CURE NOTICE

PLEASE TAKE NOTICE that, on June 7, 2021, Marubeni Oil & Gas (USA) LLC ("MOGUS") filed its Objection (Docket Nos. 1509, 1515) to Debtors' Notice to Contract Parties to Executory Contracts and Unexpired Leases of the Schedule of Assumed Contracts and Cure Amounts (Docket No. 1395) and Notice of Filing of Amended Schedule of Assumed Contracts and Cure Amounts (Docket No. 1456) (collectively, the "Cure Notice").

<sup>&</sup>lt;sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

PLEASE TAKE FURTHER NOTICE that Debtors and MOGUS have engaged in good faith discussions to consensually resolve MOGUS' various objections to the Cure Notice, as set forth in MOGUS' Objection.

**PLEASE TAKE FURTHER NOTICE** that, based upon the aforementioned good faith discussions, MOGUS, through counsel, hereby withdraws its Objection at Docket Nos. 1509 & 1515.

Respectfully Submitted,

## LOOPER GOODWINE P.C.

/s/ Paul J. Goodwine

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Attorneys for Marubeni Oil & Gas (USA) LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2021, a true and correct copy of the foregoing notice was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas to all parties authorized to receive electronic notice in this case.

/s/ Paul J. Goodwine

Paul J. Goodwine